



WASHINGTON STATE
GAMBLING COMMISSION

Field Operation Rule Interpretation

Question: Who can serve on the count team at house banked card rooms?

CITE: WAC 230-40-885 (2) - Restricted Entry

Summary

Issue:

The count team may be comprised of any licensed employee that is not in the surveillance department or does not have duties in the accounting department (including cage cashiers) that involves reviewing, approving or preparing records used in the count process

Reasoning:

Surveillance employees are excluded because they have access to the recording equipment and tapes of the count and also may be in a position to identify weaknesses in the surveillance coverage.

The above described accounting staff are excluded because they may be in a position to alter documents recording the count.

There is no limitation on how many of the count staff may be from one department. The card rooms are small with a limited number of staff and it's likely the employees all know each other so to limit the number from one department does little to avoid collusion.

Dealers may also perform counts in which they have signed on fill and credits. The dealers are one of many people signing on the forms and it would be difficult for them to make changes to the forms without the cooperation of many others. The copies of the forms are also matched up and compared to the master game report by accounting staff.

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